

EXHIBIT A

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF SPARTANBURG)	
Jennifer Nightingale,)	
)	Civil Action No. 16-CP-42-_____
)	
Plaintiff,)	
)	
vs.)	SUMMONS
)	
Caliber Collision Centers,)	
)	
Defendant.)	

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

TALLEY LAW FIRM, P.A.

s/ Shannon M. Phillips

 Scott F. Talley
 Shannon M. Phillips
 134 Oakland Avenue
 Spartanburg, South Carolina 29302
 864-595-2966
 Attorneys for Plaintiff

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF SPARTANBURG)	
Jennifer Nightingale,)	
)	Civil Action No. 16-CP-42-_____
)	
Plaintiff,)	
)	
vs.)	COMPLAINT
)	
Caliber Collision Centers,)	
)	
Defendant.)	

Jennifer Nightingale (hereafter "Plaintiff"), by and through her undersigned attorney, hereby complains of the Defendant and would respectfully show unto this Court as follows:

1. Plaintiff is a resident of Spartanburg County, South Carolina.
2. Defendant Caliber Collision Centers (hereafter "Defendant") is, upon information and belief, a company organized pursuant to the laws of a state other than South Carolina, with a place of business in Spartanburg County, State of South Carolina.
3. Venue and jurisdiction are proper in this Court.
4. Plaintiff, a female, worked as a full-time employee for Defendant from October 2014 until May 2015.
5. Plaintiff was a skilled worker without performance issues at Defendant.
6. During her employment with Defendant, Plaintiff began having an extramarital affair with her supervisor, Cory Caldwell.
7. When Plaintiff refused to continue the affair, she was terminated.
8. Both Plaintiff's supervisor, Cory Caldwell, and his father, who owned the company, told Plaintiff she no longer had a job at Caliber Collision.
9. Cory Caldwell, a male, was not terminated for his role in the relationship.

10. Plaintiff's supervisor and his father told Plaintiff she would be considered for jobs in Charleston, South Carolina, or Charlotte, North Carolina, but refused to transfer Plaintiff to any of the locally open positions.
11. Plaintiff has looked for other jobs since her termination, but upon information and belief, no local businesses will hire her because of Defendant's statements about her.
12. Defendant has stated that Plaintiff was terminated for failing to come to work, but that was after Defendant told Plaintiff she no longer had a job.
13. Further, it is unlikely Defendant would have tried to transfer Plaintiff to a distant location if she was in fact terminated for performance issues.
14. Instead, Defendant was trying to hide Cory Caldwell's infidelity at Plaintiff's expense.
15. Upon information and belief, Plaintiff was not terminated for attendance issues but because of her gender.
16. Plaintiff was wrongfully terminated.
17. Plaintiff was terminated in violation of state and federal law.
18. Defendant sexually harassed Plaintiff by terminating her employment after she refused to continue the affair with her supervisor.
19. Defendant, by and through its owner, intentionally inflicted emotional distress on Plaintiff by terminating her employment for her failure to continue the affair.
20. As a result of Defendant's actions, Plaintiff has been forced to see a therapist, take medication, and incur medical expenses.
21. Further, upon information and belief, Defendant has made defamatory statements to third parties preventing Plaintiff from finding other work.

22. Defendant's actions have caused Plaintiff damages.

Wherefore, having set forth her complaint, Plaintiff prays that she recover a judgment against Defendants for actual, punitive, and consequential damages, together with costs and attorney's fees, and interest; and for such other and further relief as the Court deems just and proper. Plaintiff demands a jury trial on all issues so triable.

Dated this the 29th day of November, 2016.

TALLEY LAW FIRM, P.A.

s/ Shannon M. Phillips

Scott F. Talley

Shannon M. Phillips

134 Oakland Avenue

Spartanburg, South Carolina 29302

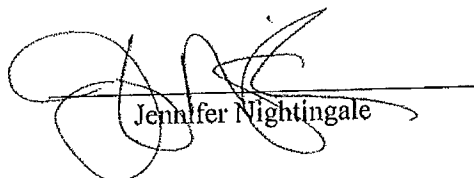
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Attorneys for Plaintiff

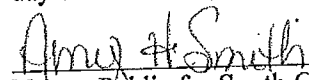
STATE OF SOUTH CAROLINA)
)
COUNTY OF SPARTANBURG)

VERIFICATION

Personally appeared before me Jennifer Nightingale, who, being by me first duly sworn, states that she is a Plaintiff in the foregoing action; that she has read the foregoing Complaint; that she has knowledge of the facts set forth herein and that the statements contained therein are true to the best of her knowledge except as to those stated to be based upon information and belief, as to which, she believes such matters to be true.


Jennifer Nightingale

SWORN to before me this 30th
day of November, 2016.

 (SEAL)
Notary Public for South Carolina
My commission expires: 12/13/21